

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Pro. No. 08-01789 (CGM)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

(Substantively Consolidated)

Defendant.

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In re:

BERNARD L. MADOFF,

Debtor.

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IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 10-05380 (CGM)

Plaintiff,

v.

SRIONE, LLC, an Idaho limited liability company,  
*et al.*,

Defendants.

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**STIPULATION AND ORDER FOR VOLUNTARY  
DISMISSAL OF DEFENDANT WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through their counsel, Baker & Hostetler LLP, and Defendant Eric Waldman by and through his counsel, Philip H. Stillman of Stillman & Associates (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 9, 2010, the Trustee filed and served his Complaint [Doc. No. 1] against Defendants Srione LLC, Dancing \$ LLC, Connie Delaney and Eric Waldman.

2. On October 19, 2011, the Trustee voluntarily dismissed Defendant Connie Delaney [Doc. No. 9].

3. On January 24, 2016, Defendants Srione LLC, Dancing \$ LLC, and Eric Waldman filed an Answer to the Complaint [Doc. No. 22].

4. On January 3, 2023, the Trustee, Srione LLC and Dancing \$ LLC filed a Stipulation for Entry of Judgment [Doc. No. 58], and on January 4, 2023, Consent Judgments were entered against Srione LLC [Doc. No. 60] and Dancing \$ [Doc. No. 61].

5. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, as incorporated by Rule 7041 of the Federal Rules of Bankruptcy Procedure, the Parties hereby stipulate to a dismissal with prejudice of the Trustee's claims against Defendant Eric Waldman.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

7. The Bankruptcy Court shall retain jurisdiction over this Stipulation.

Dated: August 14, 2023

Of Counsel:

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Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Chapter 7 Estate of Bernard L.  
Madoff*

/s/ Eric Waldman  
Defendant Eric Waldman

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*Attorneys for Defendant Eric Waldman*

/s/ Cecelia G. Morris



**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**

**Dated: August 15, 2023**  
**Poughkeepsie, New York**